

BEFORE THE STATE MEDICAL BOARD OF OHIO

IN THE MATTER OF :  
 :  
 : Case No. 12-CRF-065  
 WILLIAM DOUGLAS MILES, D.O. :

**ENTRY OF ORDER**

On December 20, 2012, William Douglas Miles, D.O., executed a Surrender of his license to practice osteopathic medicine and surgery in Ohio with consent to permanent revocation, which document is attached hereto and fully incorporated herein.

Wherefore, upon ratification by the Board of the surrender, it is hereby ORDERED that Certificate No. 34-004296 authorizing William Douglas Miles, D.O., to practice osteopathic medicine and surgery in the state of Ohio be permanently REVOKED.

This Order is hereby entered upon the Journal of the State Medical Board of Ohio for the 9<sup>th</sup> day of January 2013, and the original thereof shall be kept with said Journal.

  
\_\_\_\_\_  
J. Craig Stafford, M.D., M.P.H.  
Secretary

(SEAL)

\_\_\_\_\_  
January 9, 2013  
Date

STATE OF OHIO  
THE STATE MEDICAL BOARD  
PERMANENT SURRENDER OF CERTIFICATE  
TO PRACTICE OSTEOPATHIC MEDICINE AND SURGERY  
CASE NO. 12-CRF-065

**Do not sign this agreement without reading it. An individual who permanently surrenders a certificate issued by the Board is forever thereafter ineligible to hold a certificate to practice or to apply to the Board for reinstatement of the certificate or issuance of any new certificate. You are permitted to be accompanied, represented and advised by an attorney, at your own expense, before deciding to sign this voluntary agreement.**

I, William Douglas Miles, D.O., am aware of my rights to representation by counsel, the right of being formally charged and having a formal adjudicative hearing, and do hereby freely execute this document and choose to take the actions described herein.

I, William Douglas Miles, D.O., acknowledge that I have not been legally authorized to practice osteopathic medicine and surgery in Ohio since on or about July 24, 2012, the date upon which my license was summarily suspended by order of the Board. Further, I do hereby voluntarily, knowingly, and intelligently surrender my certificate to practice osteopathic medicine and surgery, License #34.004296, to the State Medical Board of Ohio [Board], thereby relinquishing all rights to practice osteopathic medicine and surgery in Ohio.

I understand that as a result of the surrender herein I will no longer be permitted to practice osteopathic medicine and surgery in any form or manner in the State of Ohio in the future.

I agree that I shall be ineligible for, and shall not apply for, reinstatement or restoration of certificate to practice osteopathic medicine and surgery, License #34.004296, or issuance of any other certificate pursuant to the authority of the State Medical Board of Ohio, on or after the date of signing this Surrender of Certificate to Practice Osteopathic Medicine and Surgery. Any such attempted reapplication shall be considered null and void and shall not be processed by the Board.

I hereby authorize the State Medical Board of Ohio to enter upon its Journal an Order permanently revoking my certificate to practice osteopathic medicine and surgery, License #34.004296, in conjunction with which I expressly waive the provision of Section 4731.22(B), Ohio Revised Code, requiring that six (6) Board Members vote to revoke said certificate, and further expressly and forever waive all rights as set forth in Chapter 119., Ohio Revised Code, including but not limited to my right to counsel, right to a hearing, right to present evidence, right to cross-examine witnesses, and right to appeal the Order of the Board revoking my certificate to practice osteopathic medicine and surgery.

I, William Douglas Miles, D.O., hereby release the Board, its members, employees, agents, officers and representatives jointly and severally from any and all liability arising from the within matter.

This document shall be considered a public record as that term is used in Section 149.43, Ohio Revised Code. Further, this information may be reported to appropriate organizations, data

Permanent Surrender  
William Douglas Miles, D.O.

banks and governmental bodies. I, William Douglas Miles, D.O., acknowledge that my social security number will be used if this information is so reported and agree to provide my social security number to the Board for such purposes.

I stipulate and agree that I am taking the action described herein in lieu of further formal disciplinary proceedings in Case No. 12-CRF-065, pursuant to Sections 4731.22(B)(3), (B)(5), (B)(10), (B)(24), and (B)(26), Ohio Revised Code, as set forth in the Notice of Summary Suspension and Opportunity for Hearing issued by the Board on July 24, 2012, a copy of which is attached hereto as Exhibit A and fully incorporated herein. I hereby admit to the factual and legal allegations set forth in the July 24, 2012, Notice of Summary Suspension and Opportunity for Hearing.

EFFECTIVE DATE

It is expressly understood that this Surrender of Certificate is subject to ratification by the Board prior to signature by the Secretary and Supervising Member and shall become effective upon the last date of signature below.

  
WILLIAM DOUGLAS MILES, D.O.

12-20-12  
DATE

  
J. CRAIG STRAFFORD, M.D., M.P.H.  
Secretary

9 Jan 2013  
DATE

  
DOUGLAS E. GRAFF, ESQ.  
Attorney for Dr. Miles

12-20-2012  
DATE

  
MARK A. BECHTEL, M.D.  
Supervising Member

9 Jan 2013  
DATE

  
KYLE C. WILCOX  
Assistant Attorney General

1-9-13  
DATE

# State Medical Board of Ohio

30 E. Broad Street, 3rd Floor, Columbus, OH 43215-6127

Richard A. Whitehouse, Esq.  
Executive Director

(614) 466-3934  
med.ohio.gov

July 24, 2012

Case number: 12-CRF-065

William Douglas Miles, D.O.  
2466 Tennyson Drive  
Bellbrook, Ohio 45305

Dear Doctor Miles:

Enclosed please find certified copies of the Entry of Order, the Notice of Summary Suspension and Opportunity for Hearing, and an excerpt of the Minutes of the State Medical Board, made at a conference call on July 24, 2012, scheduled pursuant to Section 4731.22(G), Ohio Revised Code, adopting the Order of Summary Suspension and issuing the Notice of Summary Suspension and Opportunity for Hearing.

You are advised that continued practice after receipt of this Order shall be considered practicing without a certificate, in violation of Section 4731.43, Ohio Revised Code.

Pursuant to Chapter 119, Ohio Revised Code, you are hereby advised that you are entitled to a hearing on the matters set forth in the Notice of Summary Suspension and Opportunity for Hearing. If you wish to request such hearing, that request must be made in writing and be received in the offices of the State Medical Board within thirty days of the time of mailing of this notice. Further information concerning such hearing is contained within the Notice of Summary Suspension and Opportunity for Hearing.

THE STATE MEDICAL BOARD OF OHIO

*J. Craig Strafford M.D., M.P.H.*  
J. Craig Strafford, M.D., M.P.H.  
Secretary

*in by authority*

JCS/KHM/sgb  
Enclosures

*Mailed 7/24/12*

**CERTIFICATION**

I hereby certify that the attached copies of the Entry of Order of the State Medical Board of Ohio and the Motion by the State Medical Board, in a conference call on July 24, 2012, scheduled pursuant to Section 4731.22(G), Ohio Revised Code, to Adopt the Order of Summary Suspension and to Issue the Notice of Summary Suspension and Opportunity for Hearing, constitute true and complete copies of the Motion and Order in the Matter of William Douglas Miles, D.O., Case number: 12-CRF- 065 as they appear in the Journal of the State Medical Board of Ohio.

This certification is made under the authority of the State Medical Board of Ohio and in its behalf.

*J. Craig Strafford, MD, MPH.*  
J. Craig Strafford, M.D., M.P.H., Secretary *by authority*

(SEAL)

July 24, 2012 \_\_\_\_\_  
Date

**BEFORE THE STATE MEDICAL BOARD OF OHIO**

IN THE MATTER OF :  
 :  
 WILLIAM DOUGLAS MILES, D.O. :  
 :  
 CASE NUMBER: 12-CRF- 065 :  
 :

**ENTRY OF ORDER**

This matter came on for consideration before the State Medical Board of Ohio the 24th day of July, 2012.

Pursuant to Section 4731.22(G), Ohio Revised Code, and upon recommendation of J. Craig Strafford, M.D., M.P.H., Secretary, and Mark A. Bechtel, M.D., Supervising Member; and

Pursuant to their determination, based upon their review of the information supporting the allegations as set forth in the Notice of Summary Suspension and Opportunity for Hearing, that there is clear and convincing evidence that Dr. Miles, has violated Sections 4731.22(B)(3), 4731.22(B)(5), 4731.22(B)(24), 4731.22(B)(26), and 4731.22(B)(10), Ohio Revised Code, to wit: Sections 2925.03, 2925.22, and 2925.23, Ohio Revised Code, as alleged in the Notice of Summary Suspension and Opportunity for Hearing that is enclosed herewith and fully incorporated herein; and,

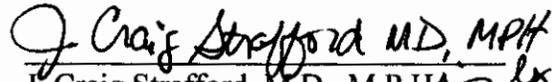
Pursuant to their further determination, based upon their review of the information supporting the allegations as set forth in the Notice of Summary Suspension and Opportunity for Hearing, that Dr. Miles's continued practice presents a danger of immediate and serious harm to the public;

The following Order is hereby entered on the Journal of the State Medical Board of Ohio for the 24th day of July 2012:

It is hereby ORDERED that the certificate of William Douglas Miles, D.O., to practice osteopathic medicine and surgery in the State of Ohio be summarily suspended.

It is hereby ORDERED that William Douglas Miles, D.O., shall immediately cease the practice of osteopathic medicine and surgery in Ohio and immediately refer all active patients to other appropriate physicians.

This Order shall become effective immediately.

  
J. Craig Strafford, M.D., M.P.H.  
Secretary

(SEAL)

July 24, 2012

Date

# State Medical Board of Ohio

30 E. Broad Street, 3rd Floor, Columbus, OH 43215-6127

Richard A. Whitehouse, Esq.  
Executive Director

(614) 466-3934  
med.ohio.gov

## EXCERPT FROM TELECONFERENCE OF JULY 24, 2012

### CONFERENCE CALL OF JULY 24, 2012 TO CONSIDER THE SUMMARY SUSPENSION OF A CERTIFICATE

#### WILLIAM DOUGLAS MILES, D.O. – ORDER OF SUMMARY SUSPENSION AND NOTICE OF OPPORTUNITY FOR HEARING

.....

**Dr. Steinbergh moved to enter an Order of Summary Suspension in the matter of William Douglas Miles, D.O., in accordance with Section 4731.22(G), Ohio Revised Code, and to issue the Notice of Summary Suspension and Opportunity for Hearing to Dr. Miles. Dr. Madia seconded the motion. A vote was taken:**

ROLL CALL:	Dr. Mahajan	- aye
	Dr. Steinbergh	- aye
	Dr. Madia	- aye
	Mr. Hairston	- aye
	Dr. Ramprasad	- aye
	Mr. Kenney	- aye

The motion carried.

Ms. Marshall stated that she has already obtained Dr. Stafford's prior authorization to affix his signature to the Order of Summary Suspension, Notice of Opportunity for Hearing, certification, and cover letter in the matter of William Douglas Miles, D.O., in his absence, in the event that the Board approved the Order.

# State Medical Board of Ohio

30 E. Broad Street, 3rd Floor, Columbus, OH 43215-6127

Richard A. Whitehouse, Esq.  
Executive Director

(614) 466-3934  
med.ohio.gov

## NOTICE OF SUMMARY SUSPENSION AND OPPORTUNITY FOR HEARING

July 24, 2012

Case number: 12-CRF- 065

William Douglas Miles, D.O.  
2466 Tennyson Drive  
Bellbrook, Ohio 45305

Dear Doctor Miles:

The Secretary and the Supervising Member of the State Medical Board of Ohio [Board] have determined that there is clear and convincing evidence that you have violated Section 4731.22(B)(3), Ohio Revised Code; Section 4731.22(B)(5), Ohio Revised Code; Section 4731.22(B)(24), Ohio Revised Code; Section 4731.22(B)(26), Ohio Revised Code; and Section 4731.22(B)(10), Ohio Revised Code, to wit: Section 2925.03, Ohio Revised Code, Trafficking; Aggravated Trafficking; and Section 2925.22, Ohio Revised Code, Deception to Obtain a Dangerous Drug; and Section 2925.23, Ohio Revised Code, Illegal Processing of Drug Documents; and have further determined that your continued practice presents a danger of immediate and serious harm to the public, as set forth in paragraphs (1) through (6), below.

Therefore, pursuant to Section 4731.22(G), Ohio Revised Code, and upon recommendation of J. Craig Strafford, M.D., M.P.H., Secretary, and Mark A. Bechtel, M.D., Supervising Member, you are hereby notified that, as set forth in the attached Entry of Order, your certificate to practice osteopathic medicine and surgery in the State of Ohio is summarily suspended. Accordingly, at this time, you are no longer authorized to practice osteopathic medicine and surgery in Ohio.

Furthermore, in accordance with Chapter 119., Ohio Revised Code, you are hereby notified that the Board intends to determine whether or not to limit, revoke, permanently revoke, suspend, refuse to register or reinstate your certificate to practice osteopathic medicine and surgery, or to reprimand you or place you on probation for one or more of the following reasons:

- (1) On or about July 12, 2012, you admitted that during or about the past year, you had relapsed by consuming opiates in excess of the amount prescribed to you. You admitted that you needed to return to treatment and that you had an addiction.
- (2) You further admitted that you obtained medication for self-use by writing prescriptions in the names of third parties, including patients, who then provided the medication to you. You issued prescriptions to the individuals identified as Patient 1 through Patient 3 on the attached Patient Key. (Patient Key is confidential and not subject to public disclosure.) You admitted that you provided a prescription for controlled substances to Patient 1 as you were under the impression that Patient 1 might go to law enforcement related to a prior prescription you had written to him for morphine which was diverted back to you. Further, you told Patient 2, an individual seeking coverage through the Bureau of Workers' Compensation [BWC], that if he did not fill a prescription for your self-use, it would jeopardize his BWC case. Further, you prescribed medication to Patient 3 who provided the medication to you.
- (3) Your disciplinary history with the Board includes the Consent Agreement Between William D. Miles, D.O. and the State Medical Board of Ohio, effective on or about June 15, 1995 [June 1995 Consent Agreement], wherein you admitted that:
  - You suffered from chemical dependency, including butalbital and opioid dependence;
  - You had received treatment for chemical dependency in or about 1981;
  - You suffered a relapse in or about 1982, and that you had regularly used and/or abused controlled substances from in or about 1982 until 1986;
  - You received inpatient treatment for opiate abuse in or about 1993.
  - You intermittently used and/or abused controlled substances from in or about 1988 until January 1995.
  - On or about January 24, 1995, you reported to the Board that you had suffered a relapse of your chemical dependency, that you had been admitted to Jewish Hospital, Cincinnati, Ohio on or about January 18, 1995; that you received treatment at Shepherd Hill in Newark, Ohio, from on or about January 25, 1995 through on or about February 16, 1995; and that you underwent additional treatment at Central Ohio Recovery Residence of Shepherd Hill from on or about February 17, 1995 to on or about March 31, 1995.
  - When completing your initial application for a certificate to practice osteopathic medicine and surgery in Ohio on or about February 10, 1987, you had falsely answered "no" to the application question that asked whether you had ever been addicted to alcohol or drugs.

Pursuant to the terms of the June 1995 Consent Agreement, your certificate to practice was suspended for an indefinite period of time, but not less than three months. You subsequently entered into the Consent Agreement between William

D. Miles, D.O., and the State Medical Board of Ohio, effective on or about November 8, 1995, whereby your certificate to practice osteopathic medicine and surgery was reinstated subject to probationary terms and conditions for a period of five years. You were released from probation in or about November 2000.

- (4) On or about July 12, 2012, after being confronted by representatives of law enforcement and the Board concerning your prescribing and admitted relapse, you executed a Voluntary Surrender of Controlled Substances Privileges [Voluntary Surrender] to the United States Department of Justice, Drug Enforcement Administration, terminating your handling of controlled substances listed in Schedules II through V.

A copy of the Voluntary Surrender is attached hereto and incorporated herein.

- (5) On or about June 18, 2012, you submitted the online biennial renewal application of your certificate to practice osteopathic medicine and surgery in Ohio. You falsely answered "No" to Question 6 that asked whether, at any time since signing your last application for renewal, you have been addicted to any chemical substance, and specifically instructs that you must answer "yes" if you have relapsed. In fact, you had relapsed during or about the year prior to submitting your June 2012 renewal.
- (6) On or about July 18, 2012, the Board received a report that you had been admitted to the Woods at Parkside, a Board-approved treatment provider in Columbus, Ohio. Although you have entered treatment, you have not completed the recommended/required treatment and entered into an aftercare contract with a Board approved treatment provider. In addition, the Board has not received information that you have been determined to be capable of practicing in accordance with acceptable and prevailing standards of care.

Section 4731.22(B)(26), Ohio Revised Code, provides that if the Board determines that an individual's ability to practice is impaired, the Board shall suspend the individual's certificate and shall require the individual, as a condition for continued, reinstated, or renewed certification to practice, to submit to treatment and, before being eligible to apply for reinstatement, to demonstrate to the Board the ability to resume practice in compliance with acceptable and prevailing standards of care, including completing required treatment, providing evidence of compliance with an aftercare contract or written consent agreement, and providing written reports indicating that the individual's ability to practice has been assessed by individuals or providers approved by the Board and that the individual has been found capable of practicing according to acceptable and prevailing standards of care.

Further, Rule 4731-16-02(B)(2), Ohio Administrative Code, additionally provides that if an individual has relapsed during or following treatment, it shall constitute independent proof

of impairment and shall support license suspension or denial without the need for an examination.

Your acts, conduct, and/or omissions as alleged in paragraphs (1) through (6) above, individually and/or collectively, constitute “[i]mpairment of ability to practice according to acceptable and prevailing standards of care because of habitual or excessive use or abuse of drugs, alcohol, or other substances that impair ability to practice,” as that clause is used in Section 4731.22(B)(26), Ohio Revised Code.

Further, your acts, conduct, and/or omissions as alleged in paragraph (2) above, individually and/or collectively, constitute “[s]elling, giving away, personally furnishing, prescribing, or administering drugs for other than legal and legitimate therapeutic purposes or a plea of guilty to, a judicial finding of guilt of, or a judicial finding of eligibility for intervention in lieu of conviction of, a violation of any federal or state law regulating the possession, distribution, or use of any drug,” as those clauses are used in Section 4731.22(B)(3), Ohio Revised Code.

Further, your acts, conduct, and/or omissions as alleged in paragraph (2) above, individually and/or collectively, constitute “[c]ommission of an act that constitutes a felony in this state, regardless of the jurisdiction in which the act was committed,” as that clause is used in Section 4731.22(B)(10), Ohio Revised Code, to wit: Section 2925.03, Ohio Revised Code, Trafficking; Aggravated Trafficking in Drugs.

Further, your acts, conduct, and/or omissions as alleged in paragraph (2) above, individually and/or collectively, constitute “[c]ommission of an act that constitutes a felony in this state, regardless of the jurisdiction in which the act was committed,” as that clause is used in Section 4731.22(B)(10), Ohio Revised Code, to wit: Section 2925.22, Ohio Revised Code, Deception to Obtain a Dangerous Drug.

Further, your acts, conduct, and/or omissions as alleged in paragraph (2) above, individually and/or collectively, constitute “[c]ommission of an act that constitutes a felony in this state, regardless of the jurisdiction in which the act was committed,” as that clause is used in Section 4731.22(B)(10), Ohio Revised Code, to wit: Section 2925.23, Ohio Revised Code, Illegal Processing of Drug Documents.

Further, the Voluntary Surrender as alleged in paragraph (4) above, constitutes “[t]he revocation, suspension, restriction, reduction, or termination of clinical privileges by the United States department of defense or department of veterans affairs or the termination or suspension of a certificate of registration to prescribe drugs by the drug enforcement administration of the United States department of justice,” as that clause is used in Section 4731.22(B)(24), Ohio Revised Code.

Further, your acts, conduct, and/or omissions as alleged in paragraph (5) above, individually and/or collectively, constitute “[m]aking a false, fraudulent, deceptive, or

misleading statement in the solicitation of or advertising for patients; in relation to the practice of medicine and surgery, osteopathic medicine and surgery, podiatric medicine and surgery, or a limited branch of medicine; or in securing or attempting to secure any certificate to practice or certificate of registration issued by the board, as that clause is used in Section 4731.22(B)(5), Ohio Revised Code.

Pursuant to Chapter 119., Ohio Revised Code, and Chapter 4731., Ohio Revised Code, you are hereby advised that you are entitled to a hearing concerning these matters. If you wish to request such hearing, the request must be made in writing and must be received in the offices of the State Medical Board within thirty days of the time of mailing of this notice.

You are further advised that, if you timely request a hearing, you are entitled to appear at such hearing in person, or by your attorney, or by such other representative as is permitted to practice before this agency, or you may present your position, arguments, or contentions in writing, and that at the hearing you may present evidence and examine witnesses appearing for or against you.

In the event that there is no request for such hearing received within thirty days of the time of mailing of this notice, the State Medical Board may, in your absence and upon consideration of this matter, determine whether or not to limit, revoke, permanently revoke, suspend, refuse to register or reinstate your certificate to practice osteopathic medicine and surgery or to reprimand you or place you on probation.

Please note that, whether or not you request a hearing, Section 4731.22(L), Ohio Revised Code, provides that “[w]hen the board refuses to grant a certificate to an applicant, revokes an individual’s certificate to practice, refuses to register an applicant, or refuses to reinstate an individual’s certificate to practice, the board may specify that its action is permanent. An individual subject to a permanent action taken by the board is forever thereafter ineligible to hold a certificate to practice and the board shall not accept an application for reinstatement of the certificate or for issuance of a new certificate.”

Copies of the applicable sections are enclosed for your information.

Very truly yours,

*J. Craig Stafford MD, MPH.*  
*by authority*

J. Craig Stafford, M.D., M.P.H.  
Secretary

JCS/KHM/sgb  
Enclosures

CERTIFIED MAIL #91 7199 9991 7031 2766 9357  
RETURN RECEIPT REQUESTED

Summary Suspension & Opportunity for Hearing  
William Douglas Miles, D.O.  
Page 6

Duplicate: By personal service

cc: Douglas E. Graff, Esq.  
Graff and Associates, CO., LPA  
604 East Rich Street  
Columbus, Ohio 43215-5341

CERTIFIED MAIL #91 7199 9991 7031 2766 9364  
RETURN RECEIPT REQUESTED

**VOLUNTARY SURRENDER OF CONTROLLED SUBSTANCES PRIVILEGES**

DEA USE ONLY

File No.

After being fully advised of my rights, and understanding that I am not required to surrender my controlled substances privileges, I freely execute this document and choose to take the actions described herein.

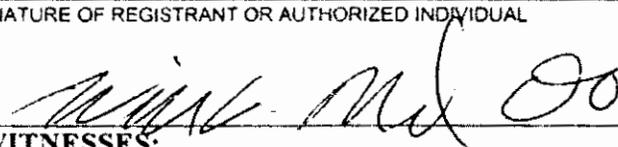
In view of my alleged failure to comply with the Federal requirements pertaining to controlled substances, and as an indication of my good faith in desiring to remedy any incorrect or unlawful practices on my part;

In view of my desire to terminate handling of controlled substances listed in schedule(s) II-V ;

I hereby voluntarily surrender my Drug Enforcement Administration Certificate of Registration, unused order forms, and all my controlled substances listed in schedule(s) II-V as evidence of my agreement to relinquish my privilege to handle controlled substances listed in schedule(s) II-V. Further, I agree and consent that this document shall be authority for the Administrator of the Drug Enforcement Administration to terminate and revoke my registration without an order to show cause, a hearing, or any other proceedings, (and if not all controlled substances privileges are surrendered, he issued a new registration certificate limited to schedule(s) N/A).

I waive refund of any payments made by me in connection with my registration.

I understand that I will not be permitted to order, manufacture, distribute, possess, dispense, administer, prescribe, or engage in any other controlled substance activities whatever, until such time as I am again properly registered.

NAME OF REGISTRANT (Print) William Douglas Miles		ADDRESS OF REGISTRANT 2466 Tennyson Drive Bellbrook, OH 45305 (Home/Registrant Address)	
DEA REGISTRATION NO. EM4801747		1755 S. Erie Hwy Suite A Hamilton, OH <i>work/clinic</i>	
SIGNATURE OF REGISTRANT OR AUTHORIZED INDIVIDUAL 		DATE 7-12- <del>10</del> 2012	
<b>WITNESSES:</b>			
NAME AND DATE <i>Eric Collins</i> 7/12/12		TITLE DEA Diversion Inv	
NAME AND DATE <i>Michael Spill</i> 7/12/12		TITLE Enforcement Investigator State Medical Board of Ohio	

**PRIVACY ACT**

**AUTHORITY:** Section 301 of the Controlled Substances Act of 1970 (PL 91-513).  
**PURPOSE:** Permit voluntary surrender of controlled substances.  
**ROUTINE USES:** The Controlled Substances Act Registration Records produces special reports as required for statistical analytical purposes. Disclosures of information from this system are made to the following categories of users for the purposes stated:  
 A. Other Federal law enforcement and regulatory agencies for law enforcement and regulatory purposes.  
 B. State and local law enforcement and regulatory agencies for law enforcement and regulatory purposes.  
 C. Persons registered under the Controlled Substances Act (Public Law 91-513) for the purpose of verifying

the registration of customers and practitioners.  
**EFFECT:** Failure to provide the information will have no effect on the individual.

**IN THE MATTER OF  
WILLIAM DOUGLAS MILES, D.O.**

**12-CRF-065**

**JULY 24, 2012, NOTICE OF  
OPPORTUNITY FOR HEARING –  
PATIENT KEY**

**SEALED TO PROTECT  
PATIENT  
CONFIDENTIALITY AND  
MAINTAINED IN CASE  
RECORD FILE.**

62001-0 11-20-19

**CONSENT AGREEMENT  
BETWEEN  
WILLIAM D. MILES, D.O.  
AND  
THE STATE MEDICAL BOARD OF OHIO**

This CONSENT AGREEMENT is entered into by and between WILLIAM D. MILES, D.O., and THE STATE MEDICAL BOARD OF OHIO, a state agency charged with enforcing Chapter 4731., Ohio Revised Code.

WILLIAM D. MILES, D.O., enters into this Agreement being fully informed of his rights under Chapter 119., Ohio Revised Code, including the right to representation by counsel and the right to a formal adjudicative hearing on the issues considered herein.

This CONSENT AGREEMENT is entered into on the basis of the following stipulations, admissions and understandings:

- A. THE STATE MEDICAL BOARD OF OHIO is empowered by Section 4731.22(A), Ohio Revised Code, to limit, revoke, suspend a certificate, refuse to register or reinstate an applicant, or reprimand or place on probation the holder of a certificate for "fraud, misrepresentation, or deception in applying for or securing any license or certificate issued by the board," as that clause is used in Section 4731.22(A), Ohio Revised Code. Further, THE STATE MEDICAL BOARD OF OHIO is empowered by Section 4731.22(B), Ohio Revised Code, to limit, revoke, suspend a certificate, refuse to register or reinstate an applicant, or reprimand or place on probation the holder of a certificate for violations of Section 4731.22(B)(5), Ohio Revised Code, "publishing a false, fraudulent, deceptive, or misleading statement"; Section 4731.22(B)(19), Ohio Revised Code, "inability to practice according to acceptable and prevailing standards of care by reason of mental illness"; and Section 4731.22(B)(26), Ohio Revised Code, "(i)mpairment of ability to practice according to acceptable and prevailing standards of care because of habitual or excessive use or abuse of drugs, alcohol, or other substances that impair ability to practice."
  
- B. THE STATE MEDICAL BOARD OF OHIO enters into this CONSENT AGREEMENT in lieu of formal proceedings based upon the violation of Section 4731.22(A), (B)(5), (B)(19), and (B)(26), Ohio Revised Code, as

CONSENT AGREEMENT  
WILLIAM D. MILES, D.O.  
PAGE 2

detailed in paragraphs D, E, and F of the June 19, 1995, Consent Agreement between WILLIAM D. MILES, D.O., and the STATE MEDICAL BOARD OF OHIO, a copy of which is attached hereto and fully incorporated herein. The BOARD expressly reserves the right to institute formal proceedings based upon any other violations of Chapter 4731. of the Revised Code, whether occurring before or after the effective date of this Agreement.

- C. WILLIAM D. MILES, D.O., is applying for reinstatement of his license to practice osteopathic medicine and surgery in the State of Ohio.
- D. WILLIAM D. MILES, D.O., STATES, and THE STATE MEDICAL BOARD OF OHIO ACKNOWLEDGES, that DOCTOR MILES has fulfilled the conditions for reinstatement of his certificate to practice osteopathic medicine and surgery in the State of Ohio, as established in the June 19, 1995, Consent Agreement between WILLIAM D. MILES, D.O., and the STATE MEDICAL BOARD OF OHIO.

Wherefore, in consideration of the foregoing and mutual promises hereinafter set forth, and in lieu of any formal proceedings at this time, WILLIAM D. MILES, D.O., shall be granted a reinstatement of his certificate to practice osteopathic medicine and surgery in the State of Ohio and knowingly and voluntarily agrees with THE STATE MEDICAL BOARD OF OHIO, (hereinafter BOARD), to the following PROBATIONARY terms, conditions and limitations:

1. DOCTOR MILES shall obey all federal, state and local laws, and all rules governing the practice of medicine in Ohio;
2. DOCTOR MILES shall submit quarterly declarations under penalty of BOARD disciplinary action or criminal prosecution, stating whether there has been compliance with all the conditions of this CONSENT AGREEMENT;
3. DOCTOR MILES shall appear in person for quarterly interviews before the BOARD or its designated representative, or as otherwise directed by the BOARD;
4. In the event that DOCTOR MILES should leave Ohio for three (3) continuous months, or reside or practice outside the State, DOCTOR MILES must notify the BOARD in writing of the dates of departure and return. Periods of time spent outside Ohio will not apply to the reduction of this period under the CONSENT AGREEMENT, unless otherwise

determined by motion of the BOARD in instances where the BOARD can be assured that probationary monitoring is otherwise being performed;

5. In the event DOCTOR MILES is found by the Secretary of the Board to have failed to comply with any provision of this agreement, and is so notified of that deficiency in writing, such period(s) of noncompliance will not apply to the reduction of the probationary period under the CONSENT AGREEMENT;
6. DOCTOR MILES shall keep a log of all controlled substances prescribed, dispensed or administered. Such log shall be submitted in the format approved by the BOARD thirty (30) days prior to DOCTOR MILES' personal appearance before the BOARD or its designated representative, or as otherwise directed by the BOARD;
7. DOCTOR MILES shall abstain completely from the personal use or possession of drugs, except those prescribed, dispensed or administered to him by another so authorized by law who has full knowledge of DOCTOR MILES' history of chemical dependency;
8. DOCTOR MILES shall abstain completely from the use of alcohol;
9. DOCTOR MILES shall submit to random urine screenings for drugs and alcohol on a weekly basis or as otherwise directed by the BOARD. DOCTOR MILES shall ensure that all screening reports are forwarded directly to the BOARD on a quarterly basis. The drug testing panel utilized must be acceptable to the Secretary of the Board;

Within thirty (30) days of the effective date of this Agreement, DOCTOR MILES shall submit to the BOARD for its prior approval the name of a supervising physician to whom DOCTOR MILES shall submit the required urine specimens. The supervising physician shall ensure that the urine specimens are obtained on a random basis, that the giving of the specimen is witnessed by a reliable person, and that appropriate control over the specimen is maintained. In addition, the supervising physician shall immediately inform the BOARD of any positive screening results;

DOCTOR MILES shall ensure that the supervising physician provides quarterly reports to the BOARD, on forms approved or provided by the BOARD, verifying whether all urine screens have been conducted in compliance with this CONSENT AGREEMENT, whether all urine screens have been negative, and whether the supervising physician remains willing and able to continue in his responsibilities.

In the event that the designated supervising physician becomes unable or unwilling to so serve, DOCTOR MILES must immediately notify the BOARD in writing, and make arrangements acceptable to the BOARD for another supervising physician as soon as practicable. DOCTOR MILES shall further ensure that the previously designated supervising physician also notifies the BOARD directly of the inability to continue to serve and the reasons therefor;

10. The BOARD retains the right to require, and DOCTOR MILES agrees to submit, blood or urine specimens for analysis upon request and without prior notice;
11. Within thirty (30) days of the effective date of this CONSENT AGREEMENT, DOCTOR MILES shall submit for the BOARD's prior approval the name of a monitoring physician, who shall review DOCTOR MILES' patient charts and shall submit a written report of such review to the BOARD on a quarterly basis. Such chart review may be done on a random basis, with the frequency and number of charts reviewed to be determined by the BOARD. It shall be DOCTOR MILES' responsibility to ensure that the monitoring physician's quarterly reports are submitted to the BOARD on a timely basis;

Further, the monitoring physician shall otherwise monitor DOCTOR MILES and provide the BOARD with quarterly reports on the doctor's progress and status. DOCTOR MILES shall ensure that such reports are forwarded to the BOARD on a quarterly basis. In the event that the designated monitoring physician becomes unable or unwilling to serve in this capacity, DOCTOR MILES must immediately so notify the BOARD in writing, and make arrangements acceptable to the BOARD for another monitoring physician as soon as practicable. DOCTOR MILES shall further ensure that the previously designated monitoring physician also notifies the BOARD directly of the inability to continue to serve and the reasons therefor;

12. Within thirty (30) days of the effective date of this CONSENT AGREEMENT, DOCTOR MILES shall undertake and maintain participation in an alcohol and drug rehabilitation program, such as A.A., N.A., or Caduceus, approved in advance by the BOARD specifically for DOCTOR MILES', no less than four (4) times per week. Substitution of any specific program must receive prior BOARD approval. At his appearances before the BOARD or its designated representative,

DOCTOR MILES shall submit acceptable documentary evidence of continuing compliance with this program;

13. Within thirty (30) days of the effective date of this Agreement, DOCTOR MILES shall submit to the BOARD for its prior approval the name and qualifications of a psychiatrist of his choice. Upon approval by the BOARD, DOCTOR MILES shall undergo and continue psychiatric treatment no less than twice monthly, or as otherwise directed by the BOARD. DOCTOR MILES shall ensure that psychiatric reports are forwarded by his treating psychiatrist to the BOARD on a quarterly basis, or as otherwise directed by the BOARD;
14. DOCTOR MILES shall obtain the approval of the BOARD for any medical practice or employment related to the health care fields. The BOARD shall consider, among other factors, the adequacy and continuity of supervision and the feasibility of restricted access to controlled substances, which will ensure the protection of the public, prior to approval or disapproval of the proposed employment;
15. DOCTOR MILES shall contact an appropriate impaired physicians committee, approved by the BOARD, to arrange for assistance in recovery or aftercare;
16. DOCTOR MILES shall maintain continued compliance with the terms of the aftercare contract entered into with his treatment provider, provided, that where terms of the aftercare contract conflict with terms of this Agreement, the terms of this Agreement shall control;
17. DOCTOR MILES shall provide continuing authorization, through appropriate written consent forms, for disclosure by his treatment provider to the BOARD, to treating and monitoring physicians, and to others involved in the monitoring process, of information necessary for them to fulfill their respective duties and obligations;
18. Within thirty (30) days of the effective date of this Agreement, DOCTOR MILES shall provide a copy of this CONSENT AGREEMENT to all employers or entities with which he is under contract to provide physician services or is receiving training; and the Chief of Staff at each hospital where he has privileges or appointments. Further, DOCTOR MILES shall provide a copy of this consent agreement to all employers or entities with which he contracts to provide physician services, or applies for or receives training, and the chief of staff at each hospital where he applies for or obtains privileges or appointments; and

19. Within thirty (30) days of the effective date of this Agreement, DOCTOR MILES shall provide a copy of this CONSENT AGREEMENT by certified mail, return receipt requested, to the proper licensing authority of any state or jurisdiction in which he currently holds a license to practice. DOCTOR MILES further agrees to provide a copy of this CONSENT AGREEMENT by certified mail, return receipt requested, at time of application to the proper licensing authority of any state in which he applies for licensure or reinstatement of licensure. Further, DOCTOR MILES shall provide this BOARD with a copy of the return receipt as proof of notification within thirty (30) days of receiving that return receipt.

This Agreement shall remain in force for a minimum of five (5) years prior to any request for termination of said Agreement. Otherwise, the above described terms, limitations and conditions may be amended or terminated in writing at any time upon the agreement of both parties.

If, in the discretion of the Secretary and Supervising Member of THE STATE MEDICAL BOARD OF OHIO, DOCTOR MILES appears to have violated or breached any term or condition of this Agreement, THE STATE MEDICAL BOARD OF OHIO reserves the right to institute formal disciplinary proceedings for any and all possible violations or breaches, including, but not limited to, alleged violations of the laws of Ohio occurring before the effective date of this Agreement.

If the Secretary and Supervising Member of the BOARD determine that there is clear and convincing evidence that DOCTOR MILES has violated any term, condition or limitation of this CONSENT Agreement, DOCTOR MILES agrees that the violation, as alleged, also constitutes clear and convincing evidence that his continued practice presents a danger of immediate and serious harm to the public for purposes of initiating a summary suspension pursuant to Section 4731.22(D), Ohio Revised Code.

If, after affording DOCTOR MILES an opportunity for hearing in accordance with Chapter 119. of the Ohio Revised Code, THE STATE MEDICAL BOARD OF OHIO determines that DOCTOR MILES has suffered a relapse, as defined in 4731-16-01(B) of the Ohio Administrative Code, THE STATE MEDICAL BOARD OF OHIO shall PERMANENTLY REVOKE DOCTOR MILES' certificate to practice osteopathic medicine and surgery in the State of Ohio.

DOCTOR MILES acknowledges that he has had an opportunity to ask questions concerning the terms of this Agreement and that all questions asked have been answered in a satisfactory manner.

Any action initiated by the BOARD based on alleged violations of this CONSENT AGREEMENT shall comply with the Administrative Procedure Act, Chapter 119., Ohio Revised Code.

DOCTOR MILES hereby releases THE STATE MEDICAL BOARD OF OHIO, its members, employees, agents, officers and representatives jointly and severally from any and all liability arising from the within matter.

This CONSENT AGREEMENT shall be considered a public record as that term is used in Section 149.43, Ohio Revised Code. It is expressly understood that this CONSENT AGREEMENT is subject to ratification by the BOARD prior to signature by the Secretary and Supervising Member and that it shall become effective upon the last date of signature below.

- Further, this information may be reported to appropriate organizations, data banks and governmental bodies.

William D. Miles D.O.  
WILLIAM D. MILES, D.O.  
Thomas E. Gretter M.D.  
THOMAS E. GREYTER, M.D.  
Secretary

11/6/95  
DATE

11/8/95  
DATE

Douglas E. Graff Esq.  
DOUGLAS E. GRAFF, ESQ.  
Attorney for Dr. Miles

Raymond J. Albert  
RAYMOND J. ALBERT  
Supervising Member

11/7/95  
DATE

Anne C. Berry Strait Esq.  
ANNE C. BERRY STRAIT, ESQ.  
Assistant Attorney General

11/8/95  
DATE

**CONSENT AGREEMENT  
BETWEEN  
WILLIAM D. MILES, D.O.  
AND  
THE STATE MEDICAL BOARD OF OHIO**

This CONSENT AGREEMENT is entered into by and between WILLIAM D. MILES, D.O., and THE STATE MEDICAL BOARD OF OHIO, a state agency charged with enforcing Chapter 4731., Ohio Revised Code.

WILLIAM D. MILES, D.O., enters into this Agreement being fully informed of his rights under Chapter 119., Ohio Revised Code, including the right to representation by counsel and the right to a formal adjudicative hearing on the issues considered herein.

This CONSENT AGREEMENT is entered into on the basis of the following stipulations, admissions and understandings:

- A. THE STATE MEDICAL BOARD OF OHIO is empowered by Section 4731.22(A), Ohio Revised Code, to limit, revoke, suspend a certificate, refuse to register or reinstate an applicant, or reprimand or place on probation the holder of a certificate for "fraud, misrepresentation, or deception in applying for or securing any license or certificate issued by the board," as that clause is used in Section 4731.22(A), Ohio Revised Code. Further, THE STATE MEDICAL BOARD OF OHIO is empowered by Section 4731.22(B), Ohio Revised Code, to limit, revoke, suspend a certificate, refuse to register or reinstate an applicant, or reprimand or place on probation the holder of a certificate for violations of Section 4731.22(B)(5), Ohio Revised Code, "publishing a false, fraudulent, deceptive, or misleading statement;" Section 4731.22(B)(19), Ohio Revised Code, "inability to practice according to acceptable and prevailing standards of care by reason of mental illness;" and Section 4731.22(B)(26), Ohio Revised Code, "(i)mpairment of ability to practice according to acceptable and prevailing standards of care because of habitual or excessive use or abuse of drugs, alcohol, or other substances that impair ability to practice."
- B. THE STATE MEDICAL BOARD OF OHIO enters into this CONSENT AGREEMENT in lieu of formal proceedings based upon the violation of Sections 4731.22(A), (B)(5), (B)(19), and (B)(26), Ohio Revised Code, as detailed in paragraphs D, E, and F below, and expressly reserves the right to institute formal proceedings based upon any other violations of Chapter 4731. of the Revised Code, whether occurring before or after the effective date of this Agreement.
- C. WILLIAM D. MILES, D.O., is licensed to practice medicine and surgery in the State of Ohio.

- D. WILLIAM D. MILES, D.O., ADMITS that he has suffered from chemical dependency, including butalbital and opioid dependence. DOCTOR MILES further admits that he received treatment for his chemical dependency at the United States Naval Hospital in California in or about 1981.

DOCTOR MILES further ADMITS that he suffered a relapse of his chemical dependency in 1982, and that he regularly used and/or abused controlled substances from 1982 until 1986, and intermittently used and/or abused controlled substances from 1988 until January 1995.

DOCTOR MILES further ADMITS that he received inpatient treatment for intermittent opiate abuse at a hospital near Salt Lake City, Utah, in 1993.

DOCTOR MILES further ADMITS that on January 24, 1995, he notified the Board that he had suffered a relapse of his chemical dependency. DOCTOR MILES additionally reported to the BOARD at that time that he had been admitted to Jewish Hospital in Cincinnati, Ohio, on January 18, 1995, and that he remained there awaiting transfer to Shepherd Hill Hospital in Newark, Ohio, a BOARD approved treatment facility, for treatment of his chemical dependency. DOCTOR MILES thereafter received treatment at Shepherd Hill Hospital in Newark, Ohio, from January 25, 1995, through February 16, 1995, and subsequent treatment at the Central Ohio Recovery Residence of Shepherd Hill Hospital from February 17, 1995, to March 31, 1995.

DOCTOR MILES is currently involved in an aftercare agreement with the Ohio Physician's Effectiveness Program with which he states he has been in full compliance.

- E. Further, WILLIAM D. MILES, D.O., ADMITS that he has suffered from depression for which he has been counseled by psychologists intermittently over the years. DOCTOR MILES further ADMITS that he received inpatient treatment for depression at a hospital near Salt Lake City, Utah, in 1993, and at Jewish Hospital in Cincinnati, Ohio, and Shepherd Hill Hospital in Newark, Ohio, in 1995, concurrent with his chemical dependency treatment at these facilities as described in paragraph D above.

- F. Further, WILLIAM D. MILES, D.O., ADMITS that on or about February 10, 1987, he responded "No" to Question 3 of the General Information Section of his application for a certificate to practice osteopathic medicine and surgery in the State of Ohio, which asks, "Have you ever been or are you now addicted to the use of drugs or alcohol?" DOCTOR MILES further ADMITS that he appeared at an office conference of the Board on October 23, 1989, at the Board's request. DOCTOR MILES further ADMITS that at such office conference he stated to Board representatives that he had taken no controlled substances since 1981, and that he provided a negative response to Question 3 because he had been told by the organization with which he was then affiliated as a locum tenens physician that he need not report matters more than five years old. DOCTOR MILES further ADMITS that the acts, conduct, or omissions, as stated in this paragraph, individually or collectively, directly or indirectly, constitute fraud, misrepresentation, or deception in applying for or securing a certificate issued by the Board in violation of Section 4731.22(A), Ohio Revised Code, and constitute publishing a false, fraudulent, deceptive, or misleading statement in violation of Section 4731.22(B)(5), Ohio Revised Code.

Wherefore, in consideration of the foregoing and mutual promises hereinafter set forth, and in lieu of any formal proceedings at this time, WILLIAM D. MILES, D.O., knowingly and voluntarily agrees with THE STATE MEDICAL BOARD OF OHIO, (hereinafter BOARD), to the following terms, conditions and limitations:

1. The certificate of DOCTOR MILES to practice medicine and surgery in the State of Ohio shall be SUSPENDED for an indefinite period of time, but not less than (3) months.
2. The BOARD shall not consider reinstatement of DOCTOR MILES' certificate to practice medicine and surgery unless and until all of the following conditions are met:
  - a. DOCTOR MILES shall submit an application for reinstatement, accompanied by appropriate fees, if any;
  - b. DOCTOR MILES shall demonstrate to the satisfaction of the BOARD that he can resume practice in compliance with acceptable and prevailing standards of care under the provisions of his certificate. Such demonstrtion shall include but shall not be limited to the following:

- i. Certification from a treatment provider approved under Section 4731.25 of the Revised Code that DOCTOR MILES has successfully completed any required inpatient treatment;
  - ii. Evidence of continuing full compliance with an aftercare contract or consent agreement;
  - iii. Two written reports indicating that DOCTOR MILES' ability to practice has been assessed and that he has been found capable of practicing according to acceptable and prevailing standards of care. The reports shall be made by individuals or providers approved by the BOARD for making such assessments and shall describe the basis for this determination.
3. DOCTOR MILES further agrees that before resuming the practice of medicine and surgery in the State of Ohio, he shall enter into a written consent agreement including probationary terms, conditions and limitations as determined by the BOARD or, if the BOARD and DOCTOR MILES are unable to agree on the terms of a written CONSENT AGREEMENT, then DOCTOR MILES further agrees to abide by any terms, conditions and limitations imposed by Board Order after a hearing conducted pursuant to Chapter 119. of the Ohio Revised Code.
4. DOCTOR MILES further agrees that upon approval of the BOARD for him to resume the practice of medicine and surgery in this State, the BOARD shall require as part of a written consent agreement continued monitoring which shall include but not be limited to compliance with a written consent agreement entered into before his resumption of practice or with conditions imposed by Board Order after a hearing conducted pursuant to Chapter 119. of the Revised Code, and upon termination of a consent agreement or Board Order submission to the BOARD for at least two years of annual progress reports made under penalty of BOARD disciplinary action or criminal prosecution stating whether DOCTOR MILES has maintained sobriety.
5. DOCTOR MILES shall provide authorization, through appropriate written consent forms, for disclosure of evaluative reports, summaries, and records, of whatever nature, by any and all parties that provide treatment.

or evaluation for DOCTOR MILES' chemical dependency, depression, or related conditions, or for purposes of complying with this CONSENT AGREEMENT, whether such treatment or evaluation occurred before or after the effective date of this CONSENT AGREEMENT. The above-mentioned evaluative reports, summaries, and records are considered medical records for purposes of Section 149.43 of the Ohio Revised Code and are confidential pursuant to statute but may be used in an administrative hearing pursuant to Ch. 119., Ohio Revised Code. DOCTOR MILES further agrees to provide the BOARD written consent permitting any treatment provider from whom he obtains treatment to notify the BOARD in the event he fails to agree to or comply with any treatment contract or aftercare contract. Failure to provide such consent, or revocation of such consent, shall constitute a violation of this CONSENT AGREEMENT.

6. In the event that DOCTOR MILES has not been engaged in the active practice of medicine and surgery for a period in excess of two years prior to application for reinstatement, the BOARD may exercise its discretion under Section 4731.222, Ohio Revised Code, to require additional evidence of DOCTOR MILES' fitness to resume practice.
7. In the event that DOCTOR MILES desires to practice medicine and surgery outside Ohio during the pendency of this Agreement, DOCTOR MILES shall provide a copy of this CONSENT AGREEMENT in advance to the proper licensing authority of any state in which he intends to practice.

The above described terms, conditions and limitations may be amended or terminated in writing at any time upon the agreement of both parties.

If, in the discretion of the Secretary and Supervising Member of THE STATE MEDICAL BOARD OF OHIO, DOCTOR MILES appears to have violated or breached any terms or conditions of this Agreement, THE STATE MEDICAL BOARD OF OHIO reserves the right to institute formal disciplinary proceedings for any and all possible violations or breaches, including but not limited to, alleged violations of the laws of Ohio occurring before the effective date of this Agreement.

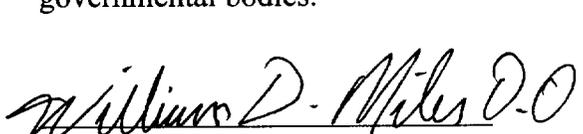
DOCTOR MILES acknowledges that he has had an opportunity to ask questions concerning the terms of this Agreement and that all questions asked have been answered in a satisfactory manner.

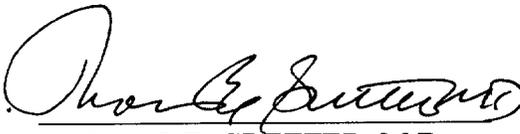
Any action initiated by the BOARD based on alleged violations of this CONSENT AGREEMENT shall comply with the Administrative Procedure Act, Chapter 119., Ohio Revised Code.

DOCTOR MILES hereby releases THE STATE MEDICAL BOARD OF OHIO, its members, employees, agents, officers and representatives jointly and severally from any and all liability arising from the within matter.

This CONSENT AGREEMENT shall be considered a public record as that term is used in Section 149.43, Ohio Revised Code. It is expressly understood that this CONSENT AGREEMENT is subject to ratification by the BOARD prior to signature by the Secretary and Supervising Member and shall become effective upon the last date of signature below.

Further, this information may be reported to appropriate organizations, data banks and governmental bodies.

  
WILLIAM D. MILES, D.O.

  
THOMAS E. GRETTER, M.D.

Secretary

5/12/95  
DATE

6/19/95  
DATE

  
DOUGLAS E. GRAFF, J.D.  
Attorney for Dr. Miles

5/12/95  
DATE

  
RAYMOND J. ALBERT  
Supervising Member

6/15/95  
DATE

  
ANNE C. BERRY STRAIT, ESQ.  
Assistant Attorney General

6/15/95  
DATE